

ALJ/VUK/jnf
#20390 [\(Rev. 1\)](#)

PROPOSED DECISION

Agenda ID

Quasi-legislative
[Item #44](#)

Rulemaking _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Petition to Adopt, Amend, or Repeal a
Regulation Pursuant to Pub. Util. Code
Section 1708.5

Petition 21-10-003

Order Instituting Rulemaking
Proceeding to Consider Amendments
to General Order 133.

Rulemaking _____

**ORDER INSTITUTING RULEMAKING PROCEEDING TO CONSIDER
AMENDMENTS TO GENERAL ORDER 133**

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Attachment A - List of Providers

ORDER INSTITUTING RULEMAKING PROCEEDING TO CONSIDER AMENDMENTS TO GENERAL ORDER 133

Summary

In response to Petition 21-10-003, this Order institutes a rulemaking proceeding to consider proposed amendments to the Commission's General Order (GO) 133-D.

Decision (D.) 16-08-021, issued on August 29, 2016, the California Public Utilities Commission (Commission) adopted GO 133-D, which revised the minimum service quality standards that legacy Plain Old Telephone Service (POTS) service providers must meet.¹ These included installation interval, installation commitments, customer trouble reports, out-of-service repair interval, and answer time.² Additionally, D.16-08-021 established a penalty mechanism, including the option to make investments in lieu of penalties.³ Lastly, D.16-08-021 changed reporting requirements for POTS providers and extended some of the outage reporting requirements to wireless and interconnected Voice over Internet Protocol (VoIP) service providers.⁴

The Commission opens this rulemaking proceeding to assess whether the existing GO 133-D service quality standards and measures meet the goals of the Commission and remain relevant to the current regulatory environment and market, including consideration of service quality standards applicable to VoIP, wireless, and broadband ~~voice-communications-services~~[service](#). Additionally, the

¹ D.16-08-021 *Decision Adopting General Order 133-D*, issued August 29, 2016, at Ordering Paragraph 1; Attachment B.

² D.16-08-021 at Ordering Paragraph 1; Attachment B, Section 3.

³ D.16-08-021 at Ordering Paragraph 1; Attachment B, Section 9.

⁴ D.09-07-019 *Decision Adopting General Order 133-C and Addressing Other Telecommunications Service Quality Reporting Requirements*, issued July 16, 2009, at 12; see also Public Utilities (Pub. Util.) Code § 2896.

Commission will consider whether the existing enforcement framework in GO 133-D is adequate to improve substandard voice communications service.

1. Background

1.1. Commission Standards for Minimum Service Quality

The California Public Utilities Commission's (Commission) General Order (GO) 133 sets minimum service quality standards for telecommunications services and includes an enforcement mechanism. The Commission last revised GO 133 (now GO 133-D) in Rulemaking (R.) 11-12-001, Decision (D.) 16-08-021. Currently, the service quality standards in GO 133-D apply to any telephone corporation, common carrier, or other entity that provides voice service in California that:

- 1) Has been granted a Certificate of Public Convenience and Necessity by the Commission, and
- 2) Is designated as an Eligible Telecommunications Carrier (ETC) by either the Federal Communications Commission (FCC) or this Commission to receive federal high-cost support and/or low-income support, and/or
- 3) Is authorized to provide California LifeLine service.⁵

GO 133-D includes minimum standards for the following metrics:

- Installation Intervals – the amount of time to install basic telephone service. The minimum standard is five business days.⁶

⁵ D.16-08-021, at 10.

⁶ GO 133-D, Section 3.1.

- Installation Commitments – the proportion of service installation commitments each provider meets, excluding those instances where customer actions prevent the provider from meeting the installation commitment. The minimum standard is 95 percent of all commitments.⁷
- Customer Trouble Report – the number of all trouble reports each provider receives from customers in relation to lines or equipment. The provider collects the data monthly and reports it to the Commission quarterly. The maximum number of trouble reports depends on the number of lines, as follows:
 - no more than 6 trouble reports per 100 lines for reporting units with 3,000 or more lines
 - no more than 8 reports per 100 lines for units with 1,001-2,999 lines
 - no more than 10 reports per hundred lines for units with 1,000 or fewer lines.⁸
- Out-of-Service Report – the length of time a customer may have to wait to have service repaired. The minimum standard is 90 percent of a provider's out-of-service repair requests must be completed within 24 hours.⁹
- Answer Time – the length of time between a customer's calling a provider's business office regarding an issue and reaching a live agent. The minimum standard is 80 percent of calls should reach a live agent in 60 seconds or less (with a menu option to reach a live agent).¹⁰

GO 133-D includes reporting requirements for the above measures.¹¹

Additionally, all telephone corporations, including wireless and interconnected Voice over Internet Provider (VoIP) service providers, are required to submit FCC

⁷ GO 133-D, Section 3.2.

⁸ GO 133-D, Section 3.3.

⁹ GO 133-D, Section 3.4.

¹⁰ GO 133-D, Section 3.5.

¹¹ GO 133-D, Section 3.2-3.5, Section 6.

Network Outage Reporting System (NORS) reports and annual ETC outage reports.¹² Wireless providers must also provide coverage maps on their websites and at retail locations.¹³

Lastly, GO 133-D sets fines for Plain Old Telephone Service (POTS) providers' failure to meet service quality measures and allows a company to propose, in lieu of paying a fine, to allocate at least twice the amount of a potential fine to investments designed to cure service quality deficiencies.¹⁴ Providers failing to meet any standard for two consecutive months must submit a corrective action plan to the Commission's Communications Division, and providers failing to meet any standard for three consecutive months are deemed to have entered chronic failure status and will begin to incur fines as specified in GO 133-D.¹⁵

When the Commission last reviewed GO 133, it found that it was not required "to apply the same type of regulations to wireless and VoIP that it applies to traditional wireline."¹⁶ Additionally, the Commission cited a history of treating services such as wireless and VoIP differently than traditional services as well as federal and state prohibitions on regulating certain aspects of such services, including those under Pub. Util. Code Section 710, which prevented the Commission from regulating VoIP and other Internet protocol (IP) enabled services under most circumstances.¹⁷ Pub. Util. Code Section 710 sunset on January 1, 2020.

¹² GO 133-D, Section 4.

¹³ GO 133-D, Section 5.

¹⁴ GO 133-D, Section 9.

¹⁵ GO 133-D, Section 9.1.

¹⁶ D.18-10-058 *Order Modifying and Denying Rehearing of D.16-08-021*, issued October 30, 2018, at 20.

¹⁷ *Ibid.*

1.2. Network Exam

As part of considering modifications to service quality standards in R.11-12-001, the Commission directed Communications Division staff to evaluate the condition of Pacific Bell Telephone Company, dba AT&T California (AT&T), and Frontier California (Frontier)'s wired network infrastructure, facility, services, and best practices to deliver consistent service quality to their customers (Network Exam).¹⁸ The Communications Division consultant produced a Phase 1 Report, covering the period of 2010-2017; the Phase 1 report made the following conclusions, relevant to service quality:

- The quality of both AT&T and Frontier voice services has declined during 2010-2017 with the number of outages increasing and service restoration times getting longer over that time.
- For AT&T, the potential revenue from migrating POTS customers to its broadband services is far greater than any financial penalty that would be imposed by the Commission for violating service quality standards.
- Both AT&T and Frontier have failed to adapt their infrastructure to withstand adverse weather conditions.
- AT&T wire centers that have been upgraded with fiber optic facilities and other broadband related investments disproportionately serve higher-income communities. Communities with the lowest household incomes tend to exhibit the highest trouble report rates, the longest out-of-service durations, and the lowest percentage of outages cleared within 24 hours.
- The areas in both AT&T's and Frontier's territories with the lowest rates of POTS line losses have experienced the steepest deteriorations in service quality.

¹⁸ See D.13-02-023 *Decision Affirming Provisions Of The Scoping Memo And Ruling*, issued March 6, 2013; D.15-08-041 *Decision Affirming Provisions Of The Scoping Memo And Ruling*, issued August 31, 2015; and D.20-12-021 *Decision Affirming Provisions Of The Scoping Memo And Ruling*, issued December 21, 2020.

- AT&T has the financial resources to maintain and upgrade its wireline network in California but has yet to do so.¹⁹

The Phase 1 Report makes several recommendations:

- Expand the financial penalties for providers that fail to meet the GO 133-D service quality standards.
- The financial consequences of poor service quality should be the same regardless of the level or effectiveness of competition in a market, whether through loss of customers and revenues (in an effectively competitive market) or through regulatory enforcement, *i.e.*, fines for non-compliance.
- The maximum Customer Trouble Report rates specified in GO 133-D should be revised downward.
- The Commission should impose uniform service quality standards on an individual wire center basis rather than on an aggregate, company-wide basis.
- GO 133-D fines should vary based on the extent of a provider's failure to meet any service quality standard.

Communications Division staff more recently issued a Phase 2 Report, covering the period of 2018-2019, which found a continuing trend of disinvestment and deteriorating service quality in AT&T's and Frontier's wireline network infrastructure. Additional findings of the Phase 2 report include:

- The frequency and average duration of service outages has increased from the prior reporting period.
- Infrastructure investments appear aimed primarily at nonregulated broadband service upgrades instead of improving legacy service facilities.

¹⁹ Examination of the Local Telecommunications Networks and Related Policies and Practices of AT&T California and Frontier California, Study conducted pursuant to the California PUC Service Quality Rulemaking 11-12-001, Decision 13-02-023, and Decision 15-08-041, April 2019 (Phase 1 report). A public version of the Phase 1 report is available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/service-quality-and-etc/network-exam-of-att-and-frontier-verizon>. See Network Exam Phase 1 Report, Chapter 1 Executive Summary at 2-3.

- Both companies have stopped marketing legacy circuit-switched telephone service, focusing instead on broadband service, which has contributed to a further decline in the quality of POTS service.
- AT&T's capital investment in its California incumbent local exchange carrier (ILEC) has diminished.
- Confirmation that AT&T's and Frontier's networks cannot withstand weather and climate conditions in the state.
- AT&T's VoIP service experiences a slightly higher rate of service outages than AT&T legacy services.
- Low-income areas that have not been targeted for broadband upgrades have the potential to lose high quality wireline voice services.²⁰

Based on these findings, the Phase 2 Report makes the following additional recommendations:

- The Commission should reevaluate the role that regulation plays over legacy and current technology services, including VoIP and broadband.
- Since Pub. Util. Code § 710 is no longer in effect, GO 133-D should be extended to apply to all wireline voice services regardless of the underlying technology.
- The Commission should expand financial penalties for providers that fail to meet the minimum GO 133-D standard. Additionally, it should eliminate the option of investment in lieu of penalties because there is no evidence that such investments were incremental or that they were targeted to improve service quality.
- The Commission should establish a process to examine alternatives to maintain adequate service to Frontier customers in the event that the parent company no longer

²⁰ Network Exam Report, Phase 2, Chapter 1 at 5-8. Available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/network-exam-documents/phase-ii/ph2ch1network-exam-2execsummary-final-report-072721redacted.pdf>.

has the financial resources to provide safe and reliable services in California.²¹

1.3. Environmental and Social Justice

In 2019, the Commission adopted the Environmental and Social Justice Action Plan (ESJ Action Plan), which seeks to expand inclusion in Commission decision-making and improve services to communities of color and low-income communities in California.²² The goals of the ESJ Action Plan include "improv[ing] access to high-quality water, communication, and transportation services for ESJ communities," and "enhanc[ing] enforcement to ensure safety and consumer protection for ESJ communities."²³ The Network Exam found that both AT&T and Frontier have focused investments over the past ten years in areas that attract greater competition, which are higher-income communities, resulting in poorer service quality and fewer alternatives for lower-income communities and communities of color.²⁴ This rulemaking seeks to address the findings of the Network Exam and further the goals of the ESJ Action Plan by determining the appropriate minimum level of service quality that all Californians, including those in low-income communities and communities of color, should receive and will ensure that penalties are adequate to improve substandard service.

1.4. Petition for Rulemaking

On September 29, 2021, the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) filed a petition to open a rulemaking to establish

²¹ Network Exam Report, Phase 2, Chapter 1 at 8-10.

²² Documents and other resources concerning the Commission's Environmental and Social Justice Action Plan are available at the following url:
<https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

²³ CPUC Environmental and Social Justice Action Plan Version 1.0, February 21, 2019 at 7.

²⁴ Network Exam Report, Phase I, Chapter 1 at 1-2.

the minimum service quality standards that customers can expect from providers of essential communications services by amending and updating GO 133-D (Petition). Cal Advocates served its petition on the service lists of R.11-12-001, R.13-03-008, R.18-03-011, R.20-02-008, R.20-08-021, and R.20-09-001. The Petition argues that communications services provided via broadband, wireless, and VoIP, along with traditional wireline telephone service, now constitute essential services.²⁵ Therefore, the petition asks the Commission to establish minimum service quality standards applicable to broadband, wireless, and VoIP services.²⁶ Currently, the Commission's minimum service quality standards apply only to POTS providers.²⁷ Cal Advocates argues that in addition to increased consumer reliance on these essential services, the state's role in regulating these services has been clarified by the sunset of Pub. Util. Code § 710 and court decisions following the FCC's Restoring Internet Freedom Order.²⁸ Cal Advocates further recommends that, in a second phase of the requested rulemaking, the Commission review and consider potential revisions to GO 133-D's penalty framework to ensure penalties result in actual improved service quality.²⁹

The Commission received timely responses to Cal Advocates' petition from:

- Calaveras Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Cal-Ore Telephone Co., Winterhaven Telephone Company, Pinnacles Telephone Co., Ponderosa

²⁵ Petition (P.) 21-10-003 *Petition of the Public Advocates Office for Rulemaking to Amend General Order 133-D to Establish Minimum Service Quality Standards for All Essential Communications Services*, filed October 7, 2021 (Petition for Rulemaking), at 1, 10, 17-18.

²⁶ Petition for Rulemaking, at 2-3.

²⁷ Petition for Rulemaking, at 2, Attachment A, Attachment B.

²⁸ Petition for Rulemaking, at 3-9, 15-17.

²⁹ Petition for Rulemaking, at 27-30.

- Telephone Co., Kerman Telephone Co., Siskiyou Telephone Company, Ducor Telephone Company, Sierra Telephone Company, Inc., Volcano Telephone Company;
- The Utility Reform Network, Center for Accessible Technology, Communications Workers of America, District 9 (collectively, Joint Respondents);
 - Pacific Bell Telephone Company, Teleport Communications America, LLC, New Cingular Wireless PCS, LLC, AT&T Corp., Santa Barbara Cellular Systems Ltd., AT&T Mobility Wireless Operations Holdings, Inc (collectively, AT&T);
 - Greenlining Institute;
 - CTIA – The Wireless Association (CTIA);
 - MCI Metro Access Transmission Services Corp., Cellco Partnership, MCI Communications Services LLC (collectively, Verizon);
 - Consolidated Communications Enterprise Services, Inc., Consolidated Communications of California Company;
 - Frontier California Inc., Frontier Communications of the Southwest Inc., Citizens Telecommunications Company of California Inc.;
 - Race Telecommunications, LLC;
 - US Telecom; and
 - California Cable and Telecommunications Association (CCTA);

The Commission received timely replies to responses on November 15, 2021 from:

- County of Inyo, Town of Truckee, County of Mono, County of Placer, Town of Mammoth Lakes, County of Nevada;
- US Telecom;
- AT&T;
- Level 3 Telecom of California, LP, CenturyLink Communications, LLC, Level 3 Communications, LLC;

- Joint Respondents;
- Cal Advocates;
- CCTA;
- CTIA; and
- Verizon.

Parties opposing the petition assert that the Commission lacks authority to regulate VoIP, wireless and/or broadband services, and competition in the voice communications marketplace makes regulation unnecessary and unwarranted.³⁰

³⁰ *Opposition Of AT&T California (U1001C); AT&T Corp. (U5002C); Teleport Communications America, Llc (U5454C); New Cingular Wireless Pcs, LLC (U3060C); AT&T Mobility Wireless Operations Holdings, Inc. (U3021C); And Santa Barbara Cellular Systems Ltd. (U3015C) (Collectively, "AT&T") To Petition Of The Public Advocates Office For Rulemaking To Amend General Order 133-D To Establish Minimum Service Quality Standards For All Essential Communications Services*, filed November 4, 2021, at 2-6, 11-14; *Response Of Frontier California Inc. (U1002C) Citizens Telecommunications Company Of California Inc. (U1024C) Frontier Communications Of The Southwest Inc. (U1026C) ("Frontier") To Petition Of The Public Advocates Office For Rulemaking To Amend General Order 133-D To Establish Minimum Service Quality Standards For All Essential Communications Services*, filed November 4, 2021 (Frontier Response), at 2-8; *Response Of MCI Communications Services LLC (U5378C), MCI Metro Access Transmission Services Corp. (U5253C), And Cellco Partnership Dba Verizon Wireless (U3001C) To Petition Of The Public Advocates Office For Rulemaking To Amend General Order 133-D To Establish Minimum Service Quality Standards For All Essential Communications Services*, filed November 4, 2021, at 2-8; *Response Of Calaveras Telephone Company (U1004C), Cal-Ore Telephone Co. (U1006C) Ducor Telephone Company (U1007C), Foresthill Telephone Co. (U1009C), Happy Valley Telephone Company (U1010C), Hornitos Telephone Company (U1011C), Kerman Telephone Co. (U1012C), Pinnacles Telephone Co. (U1013C), The Ponderosa Telephone Co. (U1014C), Sierra Telephone Company, Inc. (U1016C), The Siskiyou Telephone Company (U1017C), Volcano Telephone Company (U1019C), Winterhaven Telephone Company (U1021C) (The "Small Lecs") To Petition Of The Public Advocates Office For Rulemaking To Amend General Order 133-D To Establish Minimum Service Quality Standards For All Essential Communications Services*, filed November 4, 2021 (Small ILECs Response), at 2-7; *Response Of Consolidated Communications Of California Company (U1015C) And Consolidated Communications Enterprise Services, Inc. (U7261C) To Petition For Rulemaking To Amend General Order 133-D*, filed November 4, 2021, at 1-3; *Response Of Consolidated Communications Of California Company (U1015C) And Consolidated Communications Enterprise Services, Inc. (U7261C) To Petition For Rulemaking To Amend General Order 133-D To Establish Minimum Service Quality Standards for All Essential Communications Services*, filed November 5, 2021 (CCTA Response), at 8, 14, 17-21; *Response Of Consolidated Communications Of California Company (U1015C) And Consolidated Communications Enterprise Services, Inc. (U7261C) To Petition For Rulemaking To Amend General Order 133-D*, filed November 4, 2021, at 2-18.

Some parties also oppose changing the current policy permitting investments in lieu of penalties, arguing that recent Commission resolutions rejecting investment plans do not provide a sufficient basis to reject this policy altogether.³¹

Parties supporting the petition argue the Commission does have authority to adopt and enforce minimum service quality service standards applicable to VoIP, wireless, and broadband; the Commission has found key components of California's telecommunications industry – namely, the residential high speed broadband market and the mobile data market -- to be highly concentrated, which negates arguments that competition will ensure service quality; and even if the telecommunications market were competitive, competition is not a substitute for service quality standards.³² These parties also support revisiting the penalty mechanism based on service quality deficiencies of AT&T's and Frontier's networks.³³

2. Considerations for New Rulemaking

For the reasons set forth below, we grant Cal Advocates' petition for rulemaking, although we decline to adopt the specific proposal for modifying GO 133-D included Cal Advocates' petition. The findings and recommendations of the Network Exam weigh strongly in favor of initiating a new rulemaking to consider modifications to GO 133-D. Additionally, the Commission has recently found in certain cases that the existing penalty framework, which permits

³¹ Frontier Response, at 11; Small ILECs Response, at 9-10; CCTA Response, at 28-31.

³² *Response Of Consolidated Communications Of California Company (U1015C) And Consolidated Communications Enterprise Services, Inc. (U7261C) To Petition For Rulemaking To Amend General Order 133-D*, filed October 29, 2021 (TURN, CWA, and C for AT Response), at 3 -8, 13-14.

³³ TURN, CWA, and C for AT Response, at 9-10.

investment in lieu of penalties, is ineffective in remedying identified service quality deficiencies.³⁴

We also agree that a decreasing proportion of Californians rely on traditional wireline telephone service, while an increasing proportion rely on VoIP, wireless, and/or broadband for their voice communication needs.³⁵ Therefore, we will consider whether and how to establish and enforce service quality standards for ~~voice communications services provided via~~ VoIP, wireless, and broadband.

The Legislature contemplated a significant role for the Commission in closing the digital divide in California and bringing advanced communications services, including broadband Internet access, to all Californians as evidenced by Pub. Util. Code §§ 709, 280, 281, 275.6, 871 *et. seq.*³⁶ And courts have recognized states' police powers and their role in protecting consumers.³⁷ Based on its police powers, the Commission has adopted other rules to protect consumers, including emergency service requirements, network resiliency requirements, low-income support programs, and physical structures such as poles and conduits.³⁸ Additionally, the Commission must ensure that telephone corporations provide customer service that meets reasonable statewide service quality standards including, but not limited to, standards regarding network

³⁴ See, e.g., Resolutions T-17731 and T-17734.

³⁵ See Network Exam Report, Phase 1, Chapter 4 at 115-120.

³⁶ D.20-07-032 *Decision Adopting Metrics and Methodologies for Assessing the Relative Affordability of Utility Service*, issued July 22, 2020, at 34.

³⁷ *Mozilla Corporation v. Federal Communications Commission* (D.C. Cir. 2019) 940 F.3d 1, 81; *American Cable Association, et. Al. v. Becerra*, February 23, 2021, Hearing Transcript, at 62-67.

³⁸ D.14-01-036 *Decision Adopting Revisions to Modernize and Expand the California LifeLine Program*, issued January 27, 2014, at 46-48. D.16-08-021, at 26; D.20-07-011, at 17-22; See also Pub. Util. Code § 451, stating that the Commission has jurisdiction over utility "instrumentalities, equipment, and facilities...as are necessary to promote the safety, health, comfort, and convenience of the utility's patrons, employees, and the public."

technical quality, telephone support, installation, repair, and billing.³⁹ The Commission has previously determined that wireless and interconnected VoIP providers meet the definition of telephone corporations.⁴⁰ In the Commission's rulemaking on emergency disaster relief (R.18-03-011), the Commission confirmed jurisdiction over VoIP providers and wireless telephone corporations and defined a minimum level of service and coverage that VoIP and wireless providers must achieve for public health and safety purposes.⁴¹

This OIR is opened to assess whether service quality measures adopted in D.16-08-021 (as modified by D.16-10-019)/GO 133-D:

- Meet the goals of GO 133 (*i.e.*, ensure that telecommunications providers meet the level of service required by Pub. Util. Code § 451);
- Remain relevant to today's regulatory environment and market; and
- Incorporate an effective penalty mechanism and enforcement framework.

Additionally, this OIR closes the docket for Petition 21-10-003.

3. Preliminary Scoping Memo

The preliminary scope of issues in the proceeding is set forth below. (See the Commission's Rules of Practice and Procedure (Rules), Rule 7.1(d).⁴² As an initial matter, the Commission invites comments on this OIR; pursuant to Rule 6.2, comments on an OIR shall state any objections to the preliminary scoping memo regarding the category, issues to be considered, or schedule. The

³⁹ Pub. Util. Code § 2896.

⁴⁰ D.19-08-025, at Conclusions of Law 17, 28.

⁴¹ D.20-07-011 *Decision Adopting Wireless Provider Resiliency Strategies*, issued July 20, 2020, at Conclusions of Law 1, 5, 7, 9-43.

⁴² All references to "Rules" are to the Commission's Rules of Practice and Procedure unless otherwise indicated.

Commission also seeks comment on Phase 1 issues. The precise issues to be addressed and the process for addressing those issues will be set forth in an Assigned Commissioner's Scoping Memo. After the resolution of issues in Phase 1, the Commission will address the remaining procedural schedule.

3.1. Phase 1

1. Are there any existing service quality metrics that should be extended to wireless and interconnected VoIP services? Specify which metrics should apply to each type of technology.
2. Should the Commission modify any of the existing service quality metrics and standards, or develop new service quality standards and reporting requirements applicable to wireless and interconnected VoIP services? If so, how?
 - a. for each type of technology, if applicable.
3. Does GO 133-D's enforcement framework and penalty mechanism serve the public interest in ensuring adequate and appropriate investments in the state's telecommunications infrastructure? If not, how should the Commission modify GO 133-D to more effectively achieve this outcome?

3.2. Phase 2

1. Should the Commission adopt service quality metrics and standards and reporting requirements applicable to ~~services provided via~~ broadband service?
 - a. If so, specify the service quality metrics and standards, reporting requirements and enforcement framework for ~~services provided via~~ broadband service.

We intend for the scope of this rulemaking to be broad, and the assigned Commissioner may revise the scope to include other relevant issues that may arise in answering these questions. This order invites parties to respond to the questions listed above. The precise issues to be addressed and the process for

addressing those issues will be set forth in an assigned Commissioner's Scoping Memo.

3.3. Categorization; *Ex Parte* Communications; Need for Hearing

The Commission's Rules of Practice and Procedure require that an order instituting rulemaking preliminarily determine the category of the proceeding and the need for a hearing. As a preliminary matter, we determine that this proceeding is quasi-legislative because our consideration and approval of this matter would establish policy or rules affecting a class of regulated entities. Accordingly, *ex parte* communications are permitted without restriction or reporting requirement pursuant to Article 8 of the Rules.

We preliminarily determine that hearings are not necessary. However, the assigned Commissioner may re-evaluate the need for hearings when issuing the scoping memo for this proceeding.

3.4. Preliminary Schedule

The preliminary schedule is set forth below. The assigned Commissioner and Administrative Law Judge (ALJ) have the authority to set other dates in the proceeding or modify those below as necessary.

| | |
|--------|---|
| Day 1 | Order Instituting Rulemaking issued |
| Day 20 | Deadline for requests to be on service list |
| Day 46 | Initial Comments on Phase 1 issues filed and served |
| Day 61 | Reply Comments on Phase 1 issues filed and served |

The determination on the need for further procedural measures, including the scheduling of a pre-hearing conference, discovery, technical workshops, and/or evidentiary hearings will be made in one or more rulings issued by the assigned Commissioner. Any party that believes an evidentiary hearing is

required may address such need for hearing in comments and reply comments on this Order Instituting Rulemaking (OIR).

The assigned Commissioner or the assigned ALJ may change the schedule to promote efficient and fair administration of this proceeding. Today's decision sets a due date for comments and reply comments on the OIR. The schedule for the remainder of the proceeding will be adopted in the assigned Commissioner's Scoping Memo.

Due to the complexity and number of issues in this proceeding, it is the Commission's intent to complete this proceeding within 24 months of the date this decision is adopted. (Pub. Util. Code § 1701.5(b).)

If there are any workshops in this proceeding, notice of such workshops will be posted on the Commission's Daily Calendar to inform the public that a decision-maker or an advisor may be present at those meetings or workshops. Parties shall check the Daily Calendar regularly for such notices.

4. Service of OIR

The official service list for Petition 21-10-003 shall be the initial official service list for the rulemaking proceeding instituted by this order. Thus, any person or entity that is listed in the Party category, State Service category, or Information Only category on the Official Service List for Petition 21-10-003 will transfer to the same category on the Official Service List for this rulemaking proceeding.

We additionally provide service of this OIR to every voice, wireless and broadband provider in California, as listed in Attachment A; any new or modified rules adopted in this proceeding may apply to every voice, wireless and broadband provider that operates in California at the time such rules are adopted.

Service of the OIR does not confer party status or place any person who has received such service on the Official Service List for this proceeding.

Instructions for obtaining party status or being placed on the official service list are given below.

5. Filing and Service of Comments and Other Documents

Filing and service of comments and other documents in the proceeding are governed by the Commission's Rules of Practice and Procedure.

Parties are instructed to only serve documents on the assigned Commissioner, advisors to the assigned Commissioner, and the assigned ALJ(s) by electronic copy and not by paper copy, unless specifically instructed to do otherwise.

6. Addition to Official Service List

Addition to the official service list is governed by Rule 1.9(f) of the Commission's Rules of Practice and Procedure.

Respondents are parties to the proceeding (see Rule 1.4(d)) and will be immediately placed on the official service list.

Any person will be added to the "Information Only" category of the official service list upon request, for electronic service of all documents in the proceeding, and should do so promptly in order to ensure timely service of comments and other documents and correspondence in the proceeding. (See Rule 1.9(f).) The request must be sent to the Process Office by e-mail (process_office@cpuc.ca.gov) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the Docket Number of this rulemaking in the request.

Persons who file responsive comments thereby become parties to the proceeding (see Rule 1.4(a)(2)) and will be added to the "Parties" category of the official service list upon such filing. *In order to assure service of comments and other documents and correspondence in advance of obtaining party status, persons should promptly request addition to the "Information Only" category as*

described above; they will be removed from that category upon obtaining party status.

7. Subscription Service

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission's website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission's website at <http://subscribecpuc.cpsc.ca.gov/>.

8. Intervenor Compensation

Intervenor Compensation is permitted in this proceeding. Pursuant to Pub. Util. Code § 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation within 30 days after the prehearing conference. Parties new to participating in Commission proceedings may contact the Commission's Public Advisor.

9. Public Advisor

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission's procedures should contact the Commission's Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail public.advisor@cpuc.ca.gov. The TTY number is (866) 836-7825.

10. Public Outreach

Public Utilities Code § 1711(a) states:

Where feasible and appropriate, except for adjudication cases, before determining the scope of the proceeding, the commission shall seek the participation of those who are likely to be affected, including those who are likely to benefit from, and those who are potentially subject to, a decision in that proceeding. The commission shall demonstrate its efforts to comply with this section in the text of the initial scoping memo of the proceeding.

The Commission's Public Advisor's Office will conduct outreach to teachers' unions, school districts, libraries, safety organizations (the California Governor's Office of Emergency Services, Office of Energy Infrastructure Safety, California Department of Forestry and Fire Protection, local fire and public safety departments), local governments and tribes following adoption of this order and prior to a prehearing conference. Any additional public outreach will be described in the scoping memo of the assigned Commissioner.

11. Closure of the Docket for Petition 21-10-003

This OIR closes the docket for Petition 21-10-003. All documents that are filed and/or served in the rulemaking proceeding instituted by this OIR should have the caption for the rulemaking proceeding (and not for Petition 21-10-003).

12. Assignment of Petition 21-10-003

Darcie L. Houck is the assigned Commissioner for Petition 21-10-003 and Valerie U. Kao is the assigned ALJ.

O R D E R

IT IS ORDERED that:

1. Petition 21-10-003 is granted with respect to initiating a rulemaking to consider amendments to the Commission's service quality standards in General Order 133-D.
2. This Order Instituting Rulemaking is adopted pursuant to Rule 6 of the Commission's Rules of Practice and Procedure.
3. The preliminary categorization is quasi-legislative.
4. The preliminary determination is that a hearing is not needed.
5. The preliminary scope of issues is as stated above in Section 3.
6. Any party that expects to claim intervenor compensation for its participation in this Rulemaking must file its notice of intent to claim intervenor

compensation in accordance with Public Utilities Code § 1804(a)(1) and Rule 17.1(a)(2).

7. Petition 21-10-003 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT A:

List of Providers

Attachment A**List of Providers**

| <u>Utility ID Number</u> | <u>Provider Name</u> |
|-------------------------------------|--|
| 4526 | 2600Hz, Inc |
| 1618 | 2600Hz, Inc. |
| 4540 | 2825 Ultimate Wireless, Inc. |
| 1117 | 2Talk, LLC |
| 1747 | 4 Voice LLC |
| 1293 | 7G Network, Inc. |
| 6963 | 800 Response Information Services, LLC |
| 1740 | 805VoIP LLC |
| 1139 | 8x8, Inc. |
| 6758 | A+ Wireless, Inc |
| 7364 | AB2, LLC |
| 1332 | Abacus Group, LLC |
| 1375 | Abbax Technologies Inc |
| 1600 | AberVoice, Inc., |
| 1379 | Accelerated Voice LLC |
| 1434 | Access Media Holdings, LLC |
| 6104 | Access One, Inc. |
| 1123 | AccessLine Communications Corporation |
| 1485 | ACN Communication Services, LLC |
| 6342 | Acn Communications Services, LLC |
| 1763 | Advanced Hosted Services, Inc. |
| 7219 | Advanced Technology Distributors, Inc. |
| 1584 | Advanced Telecom Solutions, LLC |
| 6148 | Advantage Telecommunications Corp |
| 1372 | Advent Technologies Inc. |
| 1447 | Affiliated TEchnology Solutions Inc |
| 5229 | Affinity Network Incorporated |
| 1242 | Agility Communications and Technology Services Company |
| 4451 | Air Voice Wireless, LLC |
| 6692 | Airespring, Inc. |
| 3011 | AirTouch Cellular |
| 1348 | Airus Inc |
| 7175 | |
| 1561 | |

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|------|---|
| 1661 | Airus, Inc. |
| 1702 | ALE USA Inc. |
| 7144 | Allbridge, LLC |
| 1280 | Allegiant Networks, LLC |
| 4512 | Alliance Global Networks LLC |
| 1552 | Alliant Technologies LLC |
| 7349 | Alliant Technologies, LLC |
| 3025 | Allied Telesis Capital Corp. |
| 1268 | Allied Telesis Capital Corporation |
| 1580 | Alltel Corporation |
| 7368 | AltaWorx, LLC |
| 4457 | Alternate Network Technologies Inc. |
| 7342 | AMCS LLC |
| 2157 | American Broadband and Telecommunications Company |
| 5991 | American Dark Fiber, LLC |
| 1406 | American Messaging Services, LLC |
| 7082 | American Phone Services, Corp |
| 7209 | American Prepaid Telecard Inc. |
| 4458 | American Telephone Company LLC |
| 5244 | American Telesis, Inc. |
| 1792 | AmeriMex Communications Corp. |
| 6418 | Ameritel/Amerivision Comms Inc. |
| 5795 | AMP Networks LLC |
| 7297 | ANPI Business, LLC |
| 1384 | ANPI, LLC |
| 1369 | Anza Electric Co-operative, Inc. |
| 1649 | Anza Electric Cooperative, Inc. |
| 7381 | APXnet Inc |
| 1275 | Aquablue, LLC |
| 1399 | Arcadian Infracom, Inc. |
| 5248 | Arena One, LLC. |
| 1594 | Arkadin, Inc. |
| 1466 | Arrival Communications, Inc. |
| 4468 | Asset Black, LLC |
| 4327 | Assist Wireless, LLC |
| 1587 | Assist Wireless, LLC |
| 6184 | Assurance Wireless USA, L.P. |
| 5002 | Astound Broadband, LLC |
| 3021 | |
| 7264 | |
| 7318 | |
| 1590 | |

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|------|---|
| 1286 | Astound Broadband, LLC |
| 7346 | AT&T Corp. |
| 6217 | AT&T Mobility Wireless Operations Holdings Inc. |
| 1534 | ATC Outdoor DAS, LLC |
| 1258 | Atherton Fiber, LLC |
| 1761 | Atlanta DataCom, Inc |
| 1171 | Atlantic Metro Communications II, Inc. |
| 1757 | Atos Public Safety, LLC |
| 1714 | Audeamus |
| 1545 | Audian Inc. |
| 6323 | Autus Technology, LLC |
| 7336 | Avatel Technologies, Inc. |
| 1362 | Avaya Cloud Inc. |
| 7038 | Axia Technology Partners, LLC |
| 1585 | B2B Tech Services, LLC |
| 6687 | BA Telecom, Inc. |
| 6641 | Backbone Communications, Inc. |
| 1152 | Bandwidth IG, LLC |
| 7094 | Bandwidth Inc. |
| 7323 | Bandwidth.Com Clec, LLC |
| 1323 | BBTel. Inc |
| 4381 | BCM One, Inc. |
| 7194 | BCN Telecom, Inc. |
| 6762 | BCT Consulting, Inc. |
| 4520 | Belmont Telecom, Inc. |
| 1798 | Berkeley Glass & Light |
| 1313 | Bespoke Communications LLC |
| 1673 | Best Buy Health, Inc. |
| 1425 | Bestel (USA), Inc. |
| 7222 | Better World Telecom, LLC |
| 4437 | Beyond Wireless, LLC |
| 7169 | BlackPoint IT Services, Inc. |
| 1609 | Block Line Systems, LLC |
| 1381 | Blu Space Inc |
| 1322 | Bludog Telecom Inc. |
| 4436 | Blue Casa LLC |
| 1703 | Blue Jay Wireless, LLC |
| 1331 | Blue Rooster Telecom, Inc |
| 7287 | |
| 6955 | |
| 7343 | |
| 1305 | |

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|------|--|
| 6742 | BlueCloud Communications LLC |
| 1633 | Bluetone Communications LLC |
| 1457 | BluIP, Inc |
| 1234 | Boomerang Wireless, LLC |
| 6363 | BREK Communications, Inc. |
| 7160 | Bridgeconnex, LLC |
| 5525 | Bright Fiber Network, LLC |
| 1707 | Bright House Networks Information Services (California), LLC |
| 5701 | Bright Packet, Inc |
| 6306 | Broad Communication Solutions, LLC |
| 1625 | Broadband Dynamics, LLC |
| 5357 | Broadband Voice, LLC |
| 1458 | Broadsmart Global, Inc |
| 6695 | BroadSoft Adaption, Inc. |
| 6794 | Broadview Networks, Inc. |
| 5560 | Broadvox-CLEC, LLC |
| 7035 | Broadwing Communications, LLC |
| 6517 | BT Americas, Inc. |
| 1006 | BT Americas, Inc. |
| 1340 | BT Communications Sales, LLC |
| 7309 | BT Voice, LLC |
| 1004 | Buehner-Fry, Inc. |
| 7221 | BullsEye Telecom, Inc. |
| 7326 | Bullseye Telecom, Inc. |
| 1290 | Business Network Long Distance, Inc. |
| 3038 | Business Telecom, LLC |
| 3043 | Cal-Ore Communications, Inc. |
| 1445 | Cal-Ore Long Distance |
| 6598 | Cal-Ore Telephone Company |
| 1593 | Cal.net, Inc. |
| 7103 | Cal.Net, Inc. |
| 7259 | Calaveras Telephone Company |
| 1164 | California Broadband Cooperative, Inc. |
| 1433 | California Internet, L.P. |
| 7363 | California Internet, LP |
| 6509 | California Rsa No. 4 Ltd. Partnership |
| 7352 | California Rural Service Area #1, Inc. |
| 1705 | California Telecom Inc. |
| 7081 | |
| 1771 | |
| 1142 | |
| 7011 | |

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|------|--|
| 5393 | Call America, Inc. |
| 7007 | Call One Inc. |
| 1329 | Call One Inc. |
| 5607 | CallFire, Inc. |
| 1130 | Callis Communications, Inc. |
| 6996 | CallTower, Inc. |
| 1223 | CallTower, Inc. |
| 3001 | Caltel Long Distance |
| 7181 | Campus Communications Group, Inc |
| 1247 | Campus Communications Group, Inc. |
| 7127 | CapTex Telecom, LLC |
| 1321 | Carousel Industries of North America, Inc. |
| 1398 | CARYCO Tech |
| 5335 | Cause Based Commerce, Inc. |
| 1022 | CBTS Technology Solutions LLC |
| 7068 | CCI Network Services, LLC |
| 6878 | CCI Systems, Inc. |
| 1468 | CCT Telecommunications, Inc. |
| 4483 | Cebridge Telecom CA, LLC |
| 4507 | Cebridge Telecom Ca, LLC |
| 6791 | Cedar Wireless, Inc. |
| 4426 | Cellco Partnership |
| 1219 | Cenic Broadband Initiatives LLC |
| 1715 | Central Park Systems Corporation |
| 1024 | Central Telecom Long Distance, Inc. |
| 7333 | Central Valley Networks, Inc. |
| 1397 | Centurylink Communications LLC |
| 6413 | CenturyLink Communications, LLC |
| 7238 | Centurytel of Eastern Oregon, Inc. |
| 1627 | Channel Islands Telephone Company |
| 1780 | Charter Fiberlink CA-CCO, LLC |
| 1518 | Chicago Business VoIP, LLC |
| 1308 | China Telecom (Americas) Corporation |
| 1467 | China Unicom (Americas) Operations, Ltd. |
| 1741 | Chunghwa Telecom Global, Inc. |
| 1334 | Cintex Wireless, LLC. |
| 1588 | CIO NOW, LLC |
| 6716 | Cirrus Response Inc. |
| 1238 | |
| 1601 | |
| 4508 | |
| 5698 | |

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|------|---|
| 1615 | Citizens Telecommunications Co. of Ca. |
| 1351 | City Communications, Inc |
| 1645 | Clarity Communication Advisors Inc. |
| 5456 | Claro Enterprise Solutions, LLC |
| 6917 | Clear Rate Communications, Inc. |
| 7156 | ClearFuze Networks, Inc. |
| 1553 | Clearly IP Inc |
| 7330 | Cloud Computing Concepts, LLC |
| 1630 | Cloudcall, Inc. |
| 1801 | CNK Network Solutions |
| 6469 | Coastline Technology Group |
| 1675 | Cobalt IT, Inc. |
| 1527 | COEO Solutions, LLC |
| 6977 | Cogent Communications of Calif., Inc. |
| 1355 | Cohere Communications, LLC |
| 4541 | ComApp Technologies, LLC |
| 7261 | Comcast OTR1, LLC |
| 1015 | Comcast Phone of California, LLC |
| 1539 | ComDirect, Inc. |
| 4328 | Comm-Core LLC |
| 6984 | Common Sense, LLC |
| 7057 | Communications Brokers & Consultants |
| 1799 | Communications Network Billing, Inc. |
| 1569 | Communications Telefonicas Latinas Corp. |
| 1519 | ComNet (USA) LLC |
| 6772 | Comnet (USA) LLC |
| 1572 | Computer Technology Solutions, Inc. |
| 7267 | Computer Telephony Innovations, Inc. |
| 1498 | Comtech 21, LLC |
| 5684 | Configure, Inc. |
| 1460 | Conifer Communications, Inc. |
| 1294 | Connect To Communications, Inc. |
| 6663 | ConnectMe LLC |
| 7199 | ConnectTo World, Inc. |
| 4460 | Consolidated Communications Enterprise Services, Inc. |
| 1781 | Consolidated Communications of California Company |
| 6190 | Consolidated Smart Broadband Systems, LLC |
| 7150 | Consumer Cellular, Incorporated |
| 4527 | |
| 5532 | |
| 5776 | |
| 6017 | |

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|------|--------------------------------------|
| 7216 | Consumer Telcom, Inc. |
| 4176 | Conterra Wireless Broadband LLC |
| 5472 | Contivio.com Corporation |
| 1711 | Convergence Solutions, Inc |
| 1229 | ConVergence Technologies, Inc. |
| 1484 | Convergia, Inc. |
| 1760 | Corcom Communications, Inc |
| 7283 | Corcom Communications, Inc. |
| 1663 | Covoda Communications, Inc. |
| 1725 | Cox California Telcom, LLC |
| 5760 | Cox Strategic Services, LLC |
| 1358 | Creative Business Solutions, LLC |
| 1756 | Creative Interconnect Communications |
| 1281 | Crexendo Business Solutions, Inc. |
| 7272 | Cricket Wireless LLC |
| 5385 | CrossTalk Solutions, LLC |
| 1307 | Crown Castle Fiber, LLC |
| 1176 | Cruzio Media, Inc. |
| 1557 | CSC Wireless, LLC |
| 7229 | CTC Communications Corp |
| 1576 | Custom Network Solutions, Inc. |
| 4514 | Custom Teleconnect, Inc. |
| 7184 | CVIN, LLC |
| 1151 | Cybernet Communications |
| 4533 | Cybernet Communications, Inc. |
| 1453 | Cynexlink LLC |
| 1241 | Cytracom, LLC |
| 4534 | D4US, LLC |
| 1476 | Datavocity West, LLC |
| 6735 | Dati Cloud, LLC |
| 7136 | DCT Telecom Group, Inc. |
| 1772 | Dedicated IT, LLC |
| 1506 | DeltaCom, LLC |
| 1422 | DentalTek LLC |
| 6822 | DepositionConferencing.com, Inc. |
| 1768 | Desert Telecom Inc. |
| 1007 | Dial World Communications, LLC |
| 1665 | Dialink Corporation |
| 1528 | |
| 1731 | |
| 7288 | |
| 1729 | |

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| 7383 | Dialpad, Inc. |
| 1753 | DigiLink, Inc. |
| 6778 | Digital Comm Inc. |
| 7373 | Digital Transportation Corp. |
| 1690 | Digital West Networks, Inc |
| 1605 | Digital West Networks, Inc. |
| 1713 | Digital West Networks, Inc. |
| 7148 | DigitalPath, Inc. |
| 1450 | DISH Wireless LLC |
| 5377 | Distributed Computing, Inc. |
| 7382 | DLS Computer Services, Inc. |
| 1509 | DM Ventures, Inc. |
| 1390 | DMR Communications, Inc |
| 7075 | DMR Communications, Inc |
| 1531 | Dollar Phone Enterprise, Inc. |
| 1211 | Dove Communications Inc. |
| 1800 | DPAccess, LLC |
| 7313 | DSCI, LLC |
| 1495 | DSCI, LLC |
| 6273 | DSCI, LLC |
| 4431 | DTS Technology Group |
| 6658 | Ducor Telephone Company |
| 7151 | Dutale, Inc. |
| 1232 | DVS Technologies, LLC |
| 1614 | DYL, LLC |
| 1279 | Dynalink Communications, Inc. |
| 1721 | DyoPath, LLC |
| 1782 | EarthGrid PBC |
| 4260 | Earthlink, LLC |
| 1175 | Easton Telecom Services, LLC |
| 4509 | EcoVate, Inc. |
| 4476 | Edge Communications Solutions LLC |
| 1565 | Ednetics, Inc. |
| 1508 | Education Networks of America, Inc. |
| 7104 | EKAG LLC |
| 1409 | Electric LightWave, LLC |
| 6959 | Electric Lightwave, LLC |
| 7367 | EM3 Networks, LLC |
| 1155 | EMD Networking Services, Inc. |
| 1271 | |
| 7052 | |
| 1181 | |

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| 7227 | EMRFaxBox LLC |
| 7239 | ENA Healthcare Services, LLC |
| 1436 | Encartele, Inc. |
| 6948 | Encore Technology Group, LLC |
| 6837 | End2End Communications LLC |
| 1793 | eNetworks, LLC |
| 4277 | Engage Holdings, LLC |
| 7275 | Enhanced Communications Group, LLC |
| 1299 | Enhanced Communications Network Inc. |
| 4416 | Enhanced Communications Network, Inc. |
| 1795 | Entelegent Solutions, Inc. |
| 1441 | Equivoice, Inc. |
| 1650 | Essensys, Inc. |
| 1733 | Estech Systems, Inc. |
| 1648 | Eton InfoComm Technology Inc. |
| 1454 | Evacomm Corporation |
| 1592 | Everything Wireless, LLC |
| 1009 | Evolve IP |
| 1577 | Excellus Communications, LLC |
| 1522 | EXCESS TELECOM |
| 1507 | Exiant Communications LLC |
| 1479 | Expert Wireless & IT Solutions LLC |
| 4404 | Express Telecommunications Network LLC |
| 6753 | Extended Office Solutions, Inc. |
| 1161 | Extenet Systems (California) LLC |
| 1420 | ExteNet Systems, Inc. |
| 2101 | EZ Network Systems, Inc. |
| 3005 | Eze Castle Integration, Inc. |
| 1002 | Fastblue Communications, Inc. |
| 1548 | Fastmetrics, Inc |
| 5429 | Fiber International, LLC |
| 1026 | Fireline Network Solutions, Inc. |
| 7167 | FireServe, LLC |
| 1640 | First Choice Technology, Inc. |
| 6446 | First Communications, LLC |
| 1575 | Fisher Computer Consulting Inc. |
| 6067 | Fisher Wireless Services, Inc |
| 1317 | Five9 Inc |
| 1165 | |
| 7237 | |
| 1579 | |
| 1370 | |

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| 7215 | Flagman Telecom Inc. |
| 4521 | Flash Wireless, LLC |
| 7241 | FlexIP Solutions Inc. |
| 7387 | Flounders Communications, Inc. |
| 1202 | FluentStream Technologies, LLC |
| 7388 | FMS Enterprises, LLC |
| 1287 | Fonality, Inc. |
| 1728 | Fore Street Telecom LLC |
| 1250 | Forerunner Technologies, Inc. |
| 6914 | Foresthill Telephone Company, Inc. |
| 4423 | Fortessa Hosting |
| 5685 | Fourteen IP, Inc. |
| 5005 | FracTel LLC |
| 5680 | France Telecom Corporate Solutions L.L.C. |
| 1586 | France Telecom Corporate Solutions, LLC |
| 1439 | France Telecom Corporate Solutions, LLC |
| 4349 | Freeway Communications LLC |
| 1246 | Fresno Area Telephone & PBX |
| 1766 | Fresno Mobile Radio Inc. |
| 1473 | Fresno Msa Ltd. Partnership |
| 7329 | Frontier California Inc. |
| 7247 | Frontier Communications of America Inc. |
| 1487 | Frontier Communications of America, Inc |
| 1352 | Frontier Communications of the Southwest Inc. |
| 4478 | Frontier Communications Online & LD |
| 1683 | Fulton Communications, Inc |
| 1410 | Fusion Communications, LLC |
| 4353 | Fusion, LLC |
| 1354 | Fusion, LLC |
| 6842 | G12 Communications, LLC |
| 7197 | G3 Telecom USA, Inc. |
| 6649 | G3 Telecom USA, Inc. |
| 1700 | Gabbit, LLC |
| 1178 | Gateway Telnet Inc |
| 1564 | GC Pivotal, LLC |
| 3002 | Gen Mobile, Inc. |
| 1642 | GetGo Communications, LLC |
| 6673 | Gigabit Now California LLC |
| 1616 | |
| 7356 | |
| 1417 | |
| 1010 | |

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| 1604 | GigaKOM Inc. |
| 1547 | GigaMonster Networks, LLC |
| 7357 | Giggle Fiber, LLC |
| 1666 | Gladius Technologies Inc. |
| 7374 | Glencom Corporation, Inc. |
| 1697 | Global Connect Telecommunications, Inc |
| 1736 | Global Connection Inc of America |
| 1011 | Global Crossing Local Services, Inc |
| 1482 | Global Crossing Telecommunications, Inc |
| 7371 | Global Tel*Link Corporation |
| 1228 | Global Telecom Exchange, LLC |
| 7281 | GlobalPhone Corporation |
| 1570 | Globalstar USA, LLC |
| 4372 | Go Solo Technologies of Florida One, Inc. |
| 7301 | GoCo Technology (U.S.) Inc. |
| 1536 | GoDaddy.com, LLC |
| 1475 | GoDaddy.com, LLC |
| 1163 | Golden Bear Broadband LLC |
| 5427 | Google Fiber North America Inc. |
| 7240 | Google North America Inc. |
| 1597 | Google North America Inc. |
| 1296 | Google Voice, Inc. |
| 4499 | GoTel Communications, LLC |
| 1138 | Granite Telecommnications, LLC |
| 7164 | Granite Telecommunications LLC |
| 1270 | Granite Telecommunications, LLC |
| 5979 | Grasshopper Group, LLC |
| 1260 | Great America Networks, Inc. |
| 1324 | Green River Falls, LLC |
| 1778 | Greenfly Networks, Inc. |
| 6813 | Grupo NGN, Inc. |
| 1608 | GTE Mobilnet of Ca., Ltd. Ptrrshp |
| 7282 | GTT Americas, LLC |
| 1776 | GTT Americas, LLC |
| 7050 | Hamilton Long Distance Company |
| 5617 | Hamilton NG911, Inc. |
| 1544 | Happy Hamster Computer Repair LLC |
| 1767 | Happy Valley Telephone Co. |
| 1440 | |
| 6970 | |
| 1530 | |
| 1391 | |

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| 1706 | HD Carrier LLC |
| 1443 | Headland Communications |
| 1119 | Hearsay Social, Inc. |
| 7355 | HEHE Enterprises, LLC |
| 5964 | HFA of California LLC |
| 1337 | HFA Services LLC |
| 4539 | Horizon Cable TV, Inc. |
| 6592 | Hornitos Telephone Company |
| 1148 | Hosted Connection, Inc. |
| 6579 | Hudson Fiber Network Inc. |
| 1469 | Hughes Network Systems, LLC |
| 7159 | Hunter Communications, Inc. |
| 1758 | Hypercore Networks Inc |
| 1330 | I-Wireless, LLC |
| 1197 | iBasis Retail Inc. |
| 6362 | ICIM Corporation |
| 7266 | iCommerce Services, Inc. |
| 1356 | iCore Networks, Inc. |
| 1424 | IDT America Corp. |
| 1359 | IFN.com, Inc. |
| 1596 | IGEM Communications LLC |
| 1483 | Iloka, Inc. |
| 1319 | IM Telecom, LLC |
| 7303 | Impulse Advanced Communications, LLC |
| 1501 | Impulse Telecom, LLC |
| 1664 | inContact, Inc. |
| 1465 | Incontact, Inc. |
| 4536 | iNet Communications, LLC |
| 7262 | InfoReach, Inc. |
| 1215 | Inland Premier IT Solutions, Inc. |
| 7360 | Inmate Calling Solutions, LLC |
| 1568 | Innovative Telephone and Data Solutions, LLC |
| 1146 | Integrated Path Communications, LLC |
| 1472 | Integrated Service Solutions, Inc. |
| 1623 | Integrated Services Inc. |
| 1339 | Integrated Telemanagement Services |
| 1794 | Integrity Networks of CA LLC |
| 4488 | IntelePeer Networks LLC |
| 7235 | |
| 4502 | |
| 5984 | |
| 1012 | |

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| 1652 | Intellextrace, Inc. |
| 4482 | Intellextrace, Inc. |
| 1603 | Intelligent Communications Services |
| 1595 | Interactive Intelligence Telecom Inc |
| 6143 | Interactive Services Network, Inc. |
| 1720 | Interface Security Systems, LLC |
| 1688 | INTERGLOBE COMMUNICATIONS, INC. |
| 7243 | Intermountain Infrastructure Group, LLC |
| 6046 | International Telcom, LLC |
| 5837 | Interstar, Incorporated |
| 1784 | InTouch America, Inc. |
| 6624 | Intrado Communications, LLC |
| 5941 | Intrado IP Communications, Inc. |
| 5358 | Intrado Safety Communications, Inc. |
| 4545 | Inviacom, Inc. |
| 4523 | Inyo Networks, Inc. |
| 7274 | IP Horizon LLC |
| 1132 | IP Living, LLC |
| 1755 | IP Networked Services, Inc. |
| 1662 | IP Networks, Inc. |
| 7118 | IPC Network Services, Inc. |
| 7234 | Ipitimi Inc |
| 7249 | Ipitomy Communications LLC |
| 4485 | Iprot Inc |
| 7263 | ipSBS Managed Services, LLC |
| 7048 | IsoFusion, Inc. |
| 6532 | IT Management Corporation |
| 7276 | IT Management Corporation |
| 3003 | IT Support Pros, Inc. |
| 1744 | iTalk Global Communications, Inc. |
| 7380 | ITC Global Networks, LLC |
| 7365 | J. Rhodes Enterprises, LLC |
| 7324 | Jagat International, LLC |
| 1289 | Jive Communications, Inc. |
| 7321 | Jive Communications, Inc. |
| 4513 | Jive Technology Inc |
| 1631 | Jivetel Inc. |
| 1429 | JT Global, Limited |
| 1357 | |
| 7292 | |
| 1641 | |
| 1754 | |

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|------|---|
| 4543 | Junction Cloud Connections, Inc. |
| 1191 | Junction Networks, Inc. |
| 7176 | Juxto, LLC |
| 1657 | Kajeet, Inc. |
| 5227 | Karuk Tribe |
| 1611 | KDDI America, Inc. |
| 7017 | Kddi America, Inc. |
| 4386 | Kerman Telephone Company |
| 5378 | King Tech Repair LLC |
| 4438 | Konatel, Inc. |
| 5253 | Konica Minolta Business Solutions U.S.A, Inc. |
| 5712 | Kornerstones, Inc |
| 7189 | KT America, Inc. |
| 1712 | Kumo Cloud Solutions, Inc. |
| 1187 | Lake Linx Inc. |
| 3079 | LCB Communications, LLC |
| 6568 | LCR Telecommunications, LLC |
| 4532 | LDMI Telecommunications, LLC |
| 7359 | Leap Telecom, LLC |
| 1521 | Legent Comm LLC |
| 1551 | Level 3 Communications, LLC |
| 1404 | Level 3 Telecom of California, LP |
| 1400 | Lexvor |
| 4537 | Liberty Mobile Wireless LLC |
| 4464 | LightSpeed Networks, Inc. |
| 7203 | Lightyear Network Solutions, LLC |
| 1535 | LimeBox Networks, LLC |
| 1571 | Lingo Telecom of the West, LLC |
| 1583 | Lingo Telecom of the West, LLC |
| 1389 | Lit San Leandro, LLC |
| 7152 | Local Access Services LLC |
| 1233 | Locus Telecommunications, LLC |
| 5859 | Logical Telecom, LP |
| 6973 | Long Distance Access, Inc. |
| 7029 | Long Distance Consolidated Billing Co. |
| 6799 | Look International, Inc. |
| 5341 | Los Angeles Smsa Limited Partnership |
| 1724 | Loud & Clear Telecommunications, LLC |
| 6999 | |
| 1253 | |
| 1658 | |
| 1116 | |

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|------|---|
| 6647 | LTS Telecommunications Services (USA) Inc. |
| 7378 | Lucky Fiber, LLC |
| 7344 | Lumacel LLC |
| 1201 | LunaTech, Inc. |
| 6086 | LV.Net |
| 1122 | Lycamobile USA Inc. |
| 7023 | Magic Apple Technology, LLC |
| 1504 | MagicJack SMB, Inc. |
| 6330 | Magna5 LLC |
| 6965 | Magna5 LLC |
| 4542 | Mango Voice, LLC |
| 6877 | Marco Technologies, LLC |
| 7375 | Marconi Wireless Holdings, LLC |
| 3060 | Masergy Cloud Communications, Inc. |
| 6896 | MassComm, LLC |
| 1407 | Matrix Telecom, LLC |
| 1563 | Matrix Telecom, LLC |
| 1671 | Maven IT, Inc. |
| 1283 | MCC Telephony of the West, LLC |
| 1118 | MCI Communications Services, LLC |
| 1266 | MCI Communications Services, LLC |
| 7347 | MCI Communications Services, LLC |
| 1638 | MCImetro Access Transmission Services Corp. |
| 7212 | MCImetro Access Transmission Services LLC |
| 1136 | McLeod USA Telecommunications Services, LLC |
| 1636 | Medallion Telecom Inc. |
| 1709 | Medtel Communications, LLC |
| 1237 | Meriplex Telecom, LLC |
| 6640 | Metropcs California, LLC |
| 4528 | Metropolitan Telecomm of Calif., Inc. |
| 1512 | Mint Mobile, LLC |
| 1411 | Miron Enterprises, LLC |
| 5251 | Mitel Cloud Services, Inc. |
| 4371 | MitoTec, LLC |
| 5434 | Mix Networks Inc. |
| 1168 | MJ2 IP, LLC |
| 1669 | Mobi Wireless Inc. |
| 1367 | Mobile Net POSA, Inc. |
| 1423 | Mobilitie Newport Holdco, LLC |
| 1639 | |
| 1659 | |
| 1327 | |

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| 1263 | Modok, LLC |
| 6065 | Momentum Telecom, Inc |
| 7056 | Monster Technology, LLC |
| 1751 | Morse Communications Inc |
| 1326 | Mosaic Networx, LLC |
| 1610 | Mother Network Guardians LLC |
| 6900 | Mpower Communications Corp. |
| 1558 | Mpower Networks Services, Inc. |
| 1738 | Multiline Long Distance, Inc. |
| 1213 | National Access Long Distance, Inc. |
| 6981 | National Comtel Network Inc. |
| 4324 | National Processing Alliance, Inc. |
| 3090 | Nationwide Long Distance Service, Inc. |
| 1542 | NEC Cloud Communications America, Inc. |
| 6487 | NetCarrier Telecom, Inc. |
| 1291 | NetFortris Acquisition Co., Inc. |
| 7379 | NetFortris Acquisition Co., Inc. |
| 7345 | Netly Fiber Holdings, LLC |
| 6284 | Netly, LLC |
| 6081 | NetstaffHR, Inc |
| 1203 | Network Communications International Corp. |
| 4538 | Network Innovations, LLC |
| 1532 | Network Innovations, LLC |
| 7341 | Network Integration Company Partners Inc. |
| 1001 | Network IP, LLC |
| 1470 | Network Service Billing, Inc. |
| 7154 | NetZero Wireless, Inc. |
| 1647 | Neutral Tandem California, LLC |
| 1523 | Nevada County Fiber Inc |
| 6097 | New Cingular Wireless Pcs, LLC |
| 1401 | New Horizons Communications Corporation |
| 7366 | New Voice Media US, Inc. |
| 4473 | nexMatrix Telecom, Inc. |
| 6850 | Nexogy, Inc. |
| 7174 | Nextiva Government and Education, LLC |
| 1556 | NEXTIVA. INC, |
| 1775 | nexVortex, Inc. |
| 6005 | NGA 911, LLC |
| 7112 | No More PBX, LLC |
| 1621 | Nobelbiz VOIP Services, Inc. |
| 1480 | |
| 1174 | |

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|------|-------------------------------------|
| 1689 | Nobelbiz, Inc. |
| 1722 | Noble Systems Communications LLC |
| 1183 | NocTel Communications, Inc. |
| 1646 | Norcal Networks, Incorporated |
| 3028 | Norcast Communications Corporation |
| 1013 | Norcell LLC |
| 1693 | Northland Cable Television , Inc. |
| 3092 | Northview Communications Inc. |
| 1416 | Nos Communications, Inc. |
| 4484 | Nosva Limited Partnership |
| 1654 | Nosva, Limited Partnership |
| 7218 | NPG Digital Phone, LLC |
| 1497 | NSv Connect, LLC |
| 1141 | NthoNet Inc |
| 4344 | NTT America, Inc. |
| 6336 | NumberBarn, LLC |
| 6066 | Nuso, LLC |
| 6470 | NuWave Communications, Inc. |
| 1622 | NWN Corporation |
| 1373 | O1 Communications, Inc |
| 4487 | OACYS Technology |
| 5502 | OIT, LLC |
| 4544 | Olaffe, LLC |
| 1788 | One Ring Networks Inc |
| 1726 | One Voice Communications, Inc. |
| 1791 | Onepath Systems, LLC |
| 1789 | OneStream Networks, LLC |
| 7369 | Ongoing Operations, LLC |
| 6075 | Online Savings, Inc. |
| 7251 | Onstar LLC |
| 1696 | Onvoy Spectrum, LLC |
| 1674 | Onvoy, LLC |
| 1704 | Onvoy, LLC |
| 1245 | Ooma, Inc. |
| 4448 | Open5G Inc. |
| 4419 | OpenFiber Inc. |
| 1431 | Openpop.Com, Inc |
| 5935 | Opex Communications, Inc |
| 1620 | Orange Business Services U.S., Inc. |
| 1549 | Orbic North America, LLC |
| 7060 | Origin Networks, LLC |
| 1790 | |

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|------|---|
| 1681 | Origin Networks, LLC |
| 7113 | Pacific Bell |
| 1762 | Pacific Centrex Datavo, LLC |
| 1797 | Pacific Lightwave, a California Corporation |
| 7232 | Pacific Tower Ventures, LLC |
| 4461 | Pact-One Solutions, Inc. |
| 4447 | PAETEC Communications, LLC |
| 1739 | PanTerra Networks Inc. |
| 3091 | Patriot Fiber, LLC |
| 6549 | Patriot Mobile, LLC |
| 1254 | Paxio, Inc. |
| 1386 | Pay Tel Communications, Inc |
| 4511 | PayG, LLC |
| 7314 | Peace Communications LLC |
| 1637 | Peak Communications, Inc |
| 1533 | Peerless Network of California, LLC |
| 1144 | Penny Family Corporation |
| 1318 | Perrins Management Corporation |
| 7098 | Personal Network for Computing, Inc. |
| 1783 | PhoenixSoft, Inc. |
| 1656 | Phone Systems Plus |
| 1396 | Phone.Com |
| 7073 | Phoneware, Inc. |
| 1251 | Pinnacles Cellular Inc. |
| 3004 | Pinnacles Telephone Company |
| 7258 | Pioneer Technology, LLC |
| 4456 | Planet Networks CA LLC |
| 5443 | PLD, LLC |
| 1383 | Plintron Technologies USA LLC |
| 3015 | Plivo Inc. |
| 5800 | Plumas-Sierra Telecommunications |
| 1402 | PNG Telecommunications Inc. |
| 1315 | PNG Telecommunications, Inc. |
| 1364 | PNG Telecommunications, Inc. |
| 6888 | PNG Telecommunications, Inc. |
| 1361 | Point To Point |
| 4469 | Ponderosa Cablevision |
| 1692 | Precision West Telecommunications, Inc. |
| 1644 | Preferred Long Distance Inc. |
| 1750 | Preferred Long Distance, Inc. |
| 1717 | Preferred Long Distance, Inc. |
| 7129 | |

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|------|---------------------------------------|
| 1494 | Prepaid Wireless Wholesale, LLC |
| 1769 | Priority Communication Services LLC |
| 1341 | Priority Telecom Inc. |
| 1016 | Protel Communications, Inc. |
| 5657 | PS Lightwave, Inc. |
| 1388 | PTI Fiber California, LLC |
| 7046 | Public Communications Services |
| 1432 | Public Interest Telecom of CA |
| 1613 | Public Interest Telecom of California |
| 1598 | Pulsar360 Corp. |
| 7376 | PulseOne Communications, LLC |
| 1207 | Pure IP California LLC |
| 1752 | Puretalk Holdings, Inc |
| 1427 | Q Link Wireless LLC |
| 6504 | QuantumShift Communications, Inc. |
| 1737 | Quantumshift Communications, Inc. |
| 1412 | QxC Communications, Inc |
| 1264 | R Squared Telecom LLC |
| 1125 | Race Telecommunications, Inc. |
| 7013 | RadiantIQ LLC |
| 1599 | Rage technologies, Inc |
| 1474 | Raw Bandwidth Telecom, Inc |
| 1774 | Razz Professional Services, Inc. |
| 1502 | RCG Telecommunications Services LLC |
| 7172 | RCLEC, Inc. |
| 1742 | Ready Wireless, LLC |
| 4517 | Red Pocket, Inc. |
| 7002 | Red River Technology LLC |
| 1312 | Redding MSA Limited Partnership |
| 6096 | Reduced Rate Long Distance, Inc. |
| 7055 | Reliance Telecommunications, Inc. |
| 1182 | Renegade Technologies |
| 1678 | Republic Wireless, Inc |
| 4505 | Ridge Communications, Inc. |
| 6927 | Ring-U, LLC |
| 1158 | Ringaro Telecom, Inc. |
| 4522 | Ringcentral, Inc. |
| 7187 | RingRx, LLC |
| 2160 | Roadway Communications, Inc. |
| 5112 | Rocket Solutions LLC |
| 3062 | Rockynet.com, Inc |
| 7335 | |

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|------|---|
| 1796 | ROI Networks LLC |
| 1220 | Rural Broadband Now! LLC |
| 1679 | S-Net Communications, Inc. |
| 1746 | Sacramento Valley Ltd. Partnership |
| 1438 | Sage Communications, Inc. |
| 4531 | Sage Telecom Communications, LLC |
| 1320 | San Carlos Telecom Inc. |
| 1680 | Sangoma U.S., Inc. |
| 7339 | Santa Barbara Cellular Systems, Ltd. |
| 7078 | SBC Long Distance, LLC |
| 7265 | Script Inc. |
| 1785 | Secured Retail Networks, Inc. |
| 1513 | SecureNetMD LLC |
| 7334 | Securus Technologies, LLC |
| 3056 | Select Communications, LLC |
| 1380 | Selectel Inc. |
| 1643 | Sequire LLC |
| 4411 | ServiceTitan, Inc. |
| 7284 | Shammam Consulting Services, Inc. |
| 1459 | Sharpen Technologies, Inc. |
| 5535 | Shasta County Telecom, Inc. |
| 1743 | ShivaGenesis Networks, Inc a California S Corporation |
| 6875 | Shoutpoint, Inc. |
| 4410 | Sierra Nevada Communications LLC |
| 1606 | Sierra Telephone Company, Inc. |
| 6773 | Sierra Telephone Long Distance |
| 1759 | Silicon Business System |
| 6384 | Silv Communication, Inc |
| 1284 | SimpleVoIP, LLC |
| 1730 | SimpliFone, Inc. |
| 1524 | Simwood, Inc. |
| 7317 | Simwood, Inc. |
| 1537 | Single Digits, Inc. |
| 1511 | Single Point Global Incorporated |
| 7327 | SIP.US LLC |
| 1382 | Siskiyou Long Distance Company |
| 7270 | Skye Telecom LLC |
| 1735 | Skype Communications US Corporation |
| 6916 | Small Office Systems, Inc. |
| 1668 | Smart Choice Communications, LLC |
| 5675 | Smart Choice Communications, LLC |
| 1492 | |

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| 6639 | Smart City Networks, Limited Partnership |
| 7083 | SMARTech Corporation |
| 1723 | SmartTel Inc. |
| 1448 | smplsolutions |
| 1546 | Snowcrest Telephone, Inc. |
| 1779 | SoCal Computer Guys, LLC |
| 5454 | Social Communications LLC |
| 6665 | Sonic Telecom, LLC |
| 1516 | South Valley Internet Inc. |
| 1685 | Southern California Edison |
| 1727 | Southern California Telephone Company |
| 1328 | SouthPoint Communications, LLC |
| 1677 | Southwest Telephone Company |
| 1560 | Spectrotel of California LLC |
| 4524 | Spectrotel of California LLC |
| 1127 | Spectrum Advanced Services, LLC |
| 1403 | Spectrum Mobile, LLC |
| 4442 | Splice Communications, Inc. |
| 6780 | Spok, Inc. |
| 6355 | Sprint Communications Company, LP |
| 7166 | Sprint Spectrum L.P. |
| 1582 | SQF, LLC |
| 4459 | SR Technologies, Inc. |
| 1765 | Star2Star Communications, LLC |
| 1710 | StarTechTel.com, Inc. |
| 1259 | Stellar Private Cable Systems, Inc. |
| 1184 | Stream Communications, LLC |
| 1014 | STX Group LLC |
| 1017 | Succeed.net |
| 1777 | Sun Communications, Inc |
| 1157 | Sun Microwave, Inc. |
| 1363 | Super Prepaid Inc. |
| 1634 | Surfnet Communications, Inc. |
| 6800 | Swell Broadband, Inc. |
| 1143 | Syndeo, LLC |
| 1529 | Synergem Technologies, Inc |
| 6874 | T-Mobile West LLC |
| 7290 | T4 Telecom |
| 1718 | Tadiran Telecom, Inc. |
| 1224 | Tag Mobile, LLC |
| 1684 | Tahnay Telecommunications |
| 7280 | |

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| 4231 | Tailwind Voice and Data, Inc. |
| 1426 | Talk America, LLC |
| 1567 | TampaBay DSL Inc. |
| 1298 | TC Telephone, LLC |
| 7340 | TC Telephone, LLC. |
| 1510 | TCE Company, Inc. |
| 4380 | TCO Network, Inc. |
| 4397 | TCSI, Inc. |
| 1602 | TDS Long Distance Corporation |
| 1773 | TDS Metrocom, LLC |
| 1745 | Techmode Go, LLC |
| 1206 | Technology By Design, LLC |
| 1628 | Tekify Fiber, LLC |
| 5920 | Tekify, LLC |
| 4398 | Tekscape, Inc |
| 5721 | Tel-One Network Services, Inc. |
| 1285 | TelAgility Corp. |
| 7269 | Telco Connection |
| 1748 | Tele Express Business Systems Inc. |
| 1626 | Telecom Carrier Access, Inc. |
| 1749 | Telecom Evolutions, LLC |
| 1350 | Telecom House Incorporated |
| 7304 | Telecom LLC |
| 1490 | Telecom Management, Inc. |
| 1392 | Telecommunication Systems, Inc. |
| 7328 | Telelink Business Telephone Systems |
| 1124 | Telelink Services |
| 5807 | Telephone Diagnostic Services, Inc. |
| 4441 | Telephone Equipment Service Corp. |
| 1699 | Teleport Communications America, LLC |
| 5220 | Telespan Communications, LLC |
| 7385 | Telesupply, LLC |
| 1555 | Teletonix Communications, LLC |
| 7122 | Televvergence Solutions, Inc. |
| 1607 | TeleVoIPs, LLC |
| 1734 | Telexent, Inc. |
| 1653 | Teliix, Inc. |
| 7372 | Tello Communications, LLC |
| 1257 | Telmate, LLC |
| 7307 | Telnet Worldwide Inc. |
| 1499 | Telrite Corporation |
| 4439 | |

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| 5732 | Telrite Corporation |
| 5494 | Telstra Incorporated |
| 7351 | TELUS Communications (U.S.) Inc. |
| 1701 | Telzio, Inc |
| 4490 | Tempo Telecom, LLC |
| 6786 | Teo Communications, Inc. |
| 1230 | The Atteberry Group, Inc. |
| 1550 | The I.T. Workshop, LLC |
| 1353 | The Maynard Group, Inc. |
| 1612 | The Ponderosa Telephone Company |
| 4516 | The Siskiyou Telephone Company |
| 1660 | The Tech Consultants, LLC |
| 1624 | Thinking Phone Networks, LLC |
| 1695 | ThinkSecureNet, LLC |
| 1107 | ThinQ Technologies, Inc. |
| 1150 | Threshold Communications, Inc. |
| 1115 | Tierzero |
| 1619 | TieTechnology, LLC |
| 4491 | Time Warner Cable Information Services (Calif) |
| 7277 | Toly Digital Networks, Inc. |
| 1177 | Ton80 Communications, LLC |
| 7252 | Top Notch Networking, LLC |
| 1455 | Tophat Communications, LLC |
| 6952 | TouchTone Communications Inc |
| 1452 | Tracfone Wireless |
| 1394 | Transbeam, Inc. |
| 1517 | Transcom Telecommunications |
| 1635 | Transtelco, Inc. |
| 1520 | Triton Networks LLC |
| 1217 | Triton Networks, LLC |
| 1632 | TruConnect Communications, Inc. |
| 5814 | Truphone, Inc |
| 1019 | TTM communications, Inc. |
| 1667 | Turnkey Progressive Technology, Inc. |
| 1135 | Twilio International Inc. |
| 1428 | Two Cans and Some String, Inc. |
| 1770 | U.S. South Communications, Inc |
| 1514 | U.S. Telecom Long Distance, Inc. |
| 1787 | U.S. Telepacific Corp. |
| 1387 | U.S. Telepacific Corp. |
| 1225 | Ultimate Internet Access, Inc. |
| 1449 | |

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| 1491 | Ultimate Internet Access, Inc. |
| 1365 | Unified Global Solutions, LLC |
| 1708 | Unified Office, Inc. |
| 7278 | Unitas Global LLC |
| 1716 | UniVoIP Inc. |
| 1444 | UniVoIP, Inc. |
| 5751 | UPNETWORX, Inc. |
| 6644 | USIPCommunications LLC |
| 7061 | USNIX Corporation |
| 1581 | UT&T LLC |
| 6146 | Utility Telecom Group, LLC |
| 7220 | UVNV, Inc |
| 1559 | UVoice USA, LLC |
| 6985 | Value-Added Communications, Inc. |
| 6226 | Varcomm Broadband, Inc. |
| 7079 | Varietel Communications, LLC |
| 7214 | Vaya Telecom, Inc. |
| 1496 | VB Cloud Communications LLC |
| 4515 | VDT, LLC |
| 1021 | Velocity Communications, Inc. |
| 1629 | Velocity Fiber, LLC |
| 4308 | Velocity The Greatest Phone Company Ever, Inc |
| 5233 | Velocity, A Managed Services Company, Inc. |
| 5519 | Veracity Networks, LLC |
| 7296 | Verizon California, Inc. |
| 7178 | Verizon Long Distance LLC |
| 1477 | Verizon Select Services, Inc. |
| 6884 | Vero Fiber Networks, LLC |
| 1538 | Versatel, LLC |
| 6645 | Vertex Telecom, Inc. |
| 1515 | Vertex Telecom, Inc. |
| 1109 | ViaSat, Inc. |
| 1691 | Vicomptel USA Inc. |
| 5553 | Vine Clouds Technologies |
| 1385 | Virtual Technologies Group, Inc. |
| 1347 | Visible Service LLC |
| 7207 | Vision CTS, LLC |
| 1574 | Vision Voice and Data Systems, LLC |
| 6989 | Vive Communications, LLC |
| 4535 | Vocal Ip Networx, Ltd. |
| 1345 | Vocalocity, Inc. |
| 1591 | |

6102 Voda Networks, Inc.
4489 Vodafone US Inc.
1314 Vodafone US Inc.
1377 Vodafone US Inc.
1335 Vodex Communications Corporation
4350 Vodex Communications Corporation
6651 Voice Ring, Inc.
1301 Voicecom Telecommunications, LLC
VoIP International LLC
VoIP Tech LLC
Voipia Networks, Inc.
VoIPLy, LLC
VOIPo LLC
VoIPStreet Inc
VoIPX International, Inc.
Volcano Long Distance
Volcano Telephone Company
Volte Communications, Inc
Vonage America Inc.
Votacall, Inc.
Voxology Carrier Services, Inc.
VOXtell LLC
Voxter Communications, Inc.
Voyant Communications, LLC
Voyzze Communications Inc.
VTech Support, Inc.
WAVE.BAND, LLC
WaveNation LLC
Weave Communications, Inc.
Webpass Telecommunications, LLC
White Label Communications, LLC
WhiteSky Communications, LLC
Wholesale Airtime, Inc.
Wholesale Carrier Services, Inc.
Wide Voice, LLC
WiLine Networks, Inc
Wiltel Communications, LLC
WiMacTel, Inc.
Windstream Communications, LLC

Windstream Communications, LLC
Windstream New Edge, LLC
Windstream Norlight, LLC
Windstream Nuvox, LLC
WindyCitySDR
Wing Tel Inc.
Winterhaven Telephone Company
WIRED Telcom, LLC
Working Assets Funding Service, Inc.
Working Assets Funding Service, Inc.
Worldnet Communications Services, Inc.
Worldvox
Worldwide Marketing Solutions, Inc.
WTI Communications, Inc.
WTI Communications, Inc.
WWT, Inc.
X2 Comm, Inc.
Xact Associates, LLC
Xcast Labs, Inc.
Xentric Solutions Inc.
XO Communications Services
Xobee Networks, Inc.
Xtelesis Corporation
XYN Communications of California, LLC
Yardi Kube, Inc.
Ymax Communications Corporation
Yodole, LLC
YTEL Inc.
ZaiLab, Inc.
Zayo Group, LLC
Zefcom, LLC
Zen Communications, LLC
Zito West Holding, LLC
Zray Technologies Corporation
Ztar Mobile, Inc.
Ztg, Inc.
Zultys, Inc.

(END OF APPENDIX A)

Document comparison by Workshare Compare on Friday, March 11, 2022
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| Description | R._____ Kao OIR to Consider Amendments to GO 133 Agenda 3-17-2022 |
| Document 2 ID | file:///C:/Users/jnf/Desktop/REV 1\R._____ Kao OIR to Consider Amendments to GO 133 (clean REV 1).docx |
| Description | R._____ Kao OIR to Consider Amendments to GO 133 (clean REV 1) |
| Rendering set | Standard |

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| Deletion | |
| Moved from | |
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| Format change | |
| Moved deletion | |
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| Deleted cell | |
| Moved cell | |
| Split/Merged cell | |
| Padding cell | |

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| Moved to | 0 |
| Style change | 0 |

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